



RCRA COMPLIANCE AND ENFORCEMENT BRANCH  
ENFORCEMENT CASE RECOMMENDATION

FACILITY ID NUMBER: 9000746

FACILITY NAME: PEPCO Transformer Station  
- Benning Road

CASE REVIEW OFFICER: Melissa Toffel

DATE: 07-18-07

FINDINGS OF INITIAL CASE REVIEW: Facility was inspected on June 15, 2007 by an EPA contractor. Upon review of the inspection report, no violations were noted.

DISPOSITION RECOMMENDATION: **CLOSE**

JUSTIFICATION FOR RECOMMENDATION: No Violations

CONCURRENCE SECTION

CASE REVIEW OFFICER *Melissa Toffel*

DATE: 7/18/07

UNIT COORDINATOR *[Signature]*

DATE: 7/19/07

ENFORCEMENT COORDINATOR *[Signature]*

DATE: 7/20/07

dec 6/28/07  
rec'd 6/27/07  
jjs

## RCRA Subtitle I Inspection Report

### UST Compliance Inspection

Pepco Transformer Station – Benning Road  
3400 Benning Road NE  
Washington, DC 20010

Telephone Number: 202-872-2000

Date of Inspection: June 15, 2007

Facility Identification Number: 9000746

EPA Representative: Andrew Loll (Contractor), Chemical Engineer, 703-633-1645

Tank Owner: Potomac Electric Power Company

Tank Owner Representative: Fariba Mahvi, Lead Engineer, 202-331-6641

  
\_\_\_\_\_  
Andrew Loll

6/26/2007  
Date

## Background

On June 15, 2007, the United States Environmental Protection Agency (EPA), Region 3, Office of Enforcement, RCRA Compliance and Enforcement Branch, represented by its contractor, Andrew Loll of ERG, conducted a Compliance Evaluation Inspection (CEI) of the Potomac Electric Power Company (Pepco) Transformer Station located at 3400 Benning Road NE in Washington, DC to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA).

## Inspection Observations

**Inspection Procedures.** EPA Work Assignment Manager, Patricia Schwenke, contacted a representative of this facility on June 7, 2007 to schedule an inspection of the facility. Mr. Loll conducted the inspection on June 15, 2007. Upon arrival at the facility, Mr. Loll provided his credentials to Ms. Fariba Mahvi, Lead Engineer, and Dan Hume, Senior Engineer Associate. Mr. Loll explained the scope and purpose of the inspection to the facility representatives. After completing the inspection, Mr. Loll completed the Region 3 Underground Storage Tank (UST) Compliance Checklist, which is included as Attachment 1 to this report. Site management maintained all records on site.

**Tank Descriptions.** The Pepco transformer station has one UST (see Table 1), which stores transformer oil used to fill reconditioned transformer units in the adjacent shop. According to the facility's notification to the District of Columbia Environmental Health Administration, the tank is a double-walled steel with fiberglass reinforced plastic (FRP) tank. The tank was installed in January 1988. The tank contains a fill port. The tank supplies oil to the fill stations inside the shop via double-walled galvanized steel suction piping. See site diagram sketch in Attachment 1 and Photographs #1, #2, and #3 in Attachment 2 for a layout of the UST.

**Table 1**  
**Underground Storage Tank and Piping Details for the Pepco Transformer Station**

Tank No.	Material Stored	Capacity (gal.)	Installation Date	Tank Construction Material	Piping Construction Material
1	Transformer Oil	15,000	1/88	DW Steel w/FRP	DW Steel

FRP – Fiberglass reinforced plastic.

DW – Double-walled

**Tank Release Detection.** Releases from the tank are detected by a Veeder-Root (VR) TLS-300C monitoring system that conducts Automatic Tank Gauging (ATG). Any UST

alarms appear on the VR system located in the transformer shop. During the inspection, the VR monitor stated that all functions were normal. The VR runs monthly 0.2 GPH leak detection tests. Attachment 3 contains ATG monitoring and leak detection testing records for the last 13 months. Attachment 4 contains a summary of the VR monitoring system certification inspection completed on July 22, 2006.

**Piping Release Detection.** Line tightness testing is conducted on the suction piping every three years by Petro Supply, Inc. The last test, completed on November 11, 2005, showed the piping was tight. Attachment 5 contains the last two line tightness testing results.

**Spill/Overfill Prevention.** The EPA inspector observed an overfill cutoff valve in the fill pipe for the tank. The EPA inspector observed a spill bucket during the inspection, which was in good condition, surrounding the fill pipe (see Photograph #4 in Attachment 2).

**Cathodic Protection.** The double-walled steel piping is cathodically protected by a sacrificial anode system. The system is tested every three years and the last test, indicating passing results, was completed on March 26, 2007. Attachment 6 contains the last three cathodic protection testing results. The test record from 2001 indicates a potential problem in the above ground piping inside the shop that was modified prior to the testing. The 2001 results indicate the cathodic protection system passed after the modifications.

**Financial Assurance.** The facility is insured through Associated Electric & Gas Insurance Services Limited with Policy #X2660A1A06. Attachment 7 contains proof of financial assurance.

**Used Oil.** The facility drains used oil into drums or above-ground storage tanks located in an adjacent building. The EPA inspector did not observe any signs of leaks or spills.

#### Attachments

1. Region 3 UST Compliance Checklist
2. Photo Log
3. ATG Inventory and Leak Detection Testing Reports
4. Veeder-Root Monitoring Certification Summary
5. Line Tightness Testing Results
6. Cathodic Protection Testing Results
7. Proof of Financial Assurance

## Attachment 1. Region 3 UST Compliance Checklist

# Leak Detection Inspection

## I. Ownership of Tank(s)

Potomac Electric Power Company  
701 9th St NW 6th Floor  
Washington, DC 20068

## II. Location of Tank(s)

Transformer Station  
3400 Benning Rd. NE  
Washington DC 20010  
Number of Tanks at This Location: 1

## III. Tank Information

Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

Tank presently in use (circle)	Tank 1	Tank 2	Tank 3	Tank 4
If not, date last used				
If emptied, verify 1" or less of product in tank				
Month and Year Tank Installed	Jan 1988			
Material of Construction tank/pipe	Tank - Steel w/FRP Lin Pipe - Steel Lin			
Capacity of Tank (in gallons)	15,000			
Substance Stored	Diesel			

## IV.A. Release Detection For Tanks

Check the release detection method(s) used for each tank or N/A if none required.

Manual Tank Gauging (tanks under 1,000 gal.)				
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)				
Tank Tightness Testing and Inventory Control				
Automatic Tank Gauging	✓			
Vapor, Groundwater or Interstitial Monitoring				
Other approved method (SIR)				

## IV.B. Release Detection For Piping

Check the release detection method(s) used for piping.

Check Pressurized (P) or Suction (S) Piping for each tank	S			
Automatic Line Leak Detectors, <u>and</u> check one				
Vapor or Groundwater Monitoring				
Secondary Containment with Monitoring				
Line Tightness Testing	✓			

I, Andrew W. Loll  
(print name)

certify that I have inspected the above named facility on

6/15/2007  
month/day/year

Inspector's Signature: Andrew W. Loll

Date: 6/18/2007

## Leak Detection for Piping

### Pressurized Piping

A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.

Set 1	Tank 1	Tank 2	Tank 3	Tank 4
Automatic Flow Restrictor				
Automatic Shut-off Device				
Continuous Alarm System				
and				
Set 2				
Annual Line Tightness Testing				
Interstitial Monitoring				
If Interstitial Monitoring, documentation of monthly monitoring is available				
Ground-Water or Vapor Monitoring				
If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available				
Other Approved Method (specify in comments section)				

### Suction Piping

Indicate date of most recent test.

Line Tightness Testing (required every 3 years)	11/11/2005			
Secondary Containment with Interstitial Monitoring				
Ground-Water or Vapor Monitoring				
Other Approved Method (specify in comments section)				
<b>No Leak Detection Required</b> (must answer yes to all of the following questions)				
Operates at less than atmospheric pressure				
Has only one check valve, which is located directly under pump				
Slope of piping allows product to drain back into tank when suction released				
All above information on suction piping is verifiable				

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: Suction piping has manual block valves at tank and inside building.  
 Facility conducts line tightness testing every 3 years. The last two tests were  
 11/11/2005 and 12/17/2002

Inspector's Signature: Andrew W. Jell

Date: 6/18/2007

# Inventory Control and Tank Tightness Testing

Method of tank tightness testing: N/A

Address of tank tightness tester: \_\_\_\_\_

**Please complete all information for each tank**

If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				
Overages or shortages are less than 1% + 130 gals of tank's flow-through volume.				
If no, which months were not?				

**Please answer yes or no for each question**

Owner/operator can explain inventory control methods and figures used and recorded.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Records include monthly water monitoring.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Tank inventory reconciled before and after fuel delivery.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Books are reconciled monthly.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Appropriate calibration chart is used for calculating volume.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Owner can demonstrate consistency in dipsticking techniques.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The dipstick is long enough to reach the bottom of the tank.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The ends of the gauge stick are flat and not worn down.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The tank has been tested within the year & has passed the tightness test (if necessary).	Yes <input type="checkbox"/>	No <input type="checkbox"/>
A third-party certification of the tank tightness test method is available.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Tank tester complied with all certification requirements.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Monitoring and testing are maintained and available for the past 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Comments: \_\_\_\_\_

Inspector's Signature: [Signature]Date: 6/18/2007



# Vapor Monitoring N/A

Name of monitoring device: \_\_\_\_\_

Date system installed \_\_\_\_\_ Number of monitoring wells \_\_\_\_\_

Distance of monitoring well(s) from tank(s) (1) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_ (4) \_\_\_\_\_

Site assessment was conducted by: \_\_\_\_\_

Location of site assessment documentation: \_\_\_\_\_

**Please indicate yes or no for each tank**

Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.				
Well caps are tight.				
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.				
Well is free of debris or has other indications that it has been recently checked.				

**Please answer yes or no for each question**

UST excavation zone was assessed prior to vapor monitoring system installation.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
One or more USTs is/are included in system.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

**If the system is automatic, check the following:**

Power box is accessible and power light is on.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Documentation of monthly readings is available for last 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment used to take readings is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Vapor monitoring equipment has been calibrated within the last year.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

**If the system is manual, check the following:**

Documentation of monthly readings is available for last 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment used to take readings is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Vapor monitoring equipment has been calibrated within the last year.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Porous material was used for backfill.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Wells are placed within the excavation zone.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Level of background contamination is known. If so -- what is level?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

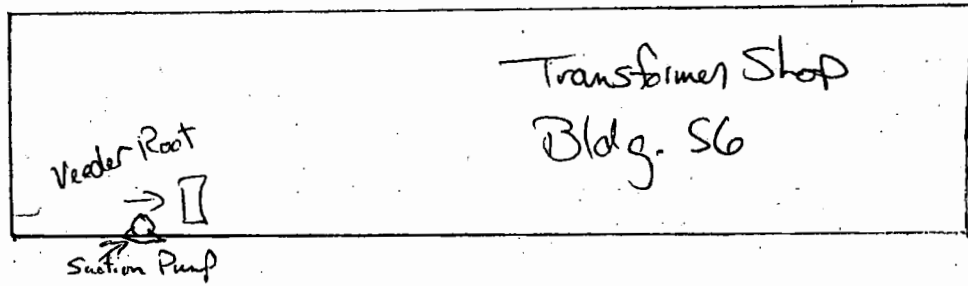
Comments: \_\_\_\_\_

Inspector's Signature: \_\_\_\_\_

Andrew W. Fall

Date: 6/18/2007

Site Sketch/Photo Log



Cathodic Protection Monitoring Well → Δ

○ ← ATG

○ ← Fill Pipe

○ ← Spare Manway

Cathodic Protection Monitoring Well → Δ

○ ← Manway Samp

**Manual Tank Gauging** N/A

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 & 4): \_\_\_\_\_

**Please answer yes or no for each question**

Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

Level measurements are based on average of two consecutive stick readings at both beginning and end of period.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

MTG is used as sole method of leak detection for tank.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

MTG is used in conjunction with tank tightness testing.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Are all tanks for which MTG is used under 2,000 gallons in capacity?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Are monitoring records available for the last 12 month period?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

Check One:	Nominal Tank Capacity (in gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
( )	110-550	N/A	5	36 hours
( )	551 - 1,000*	N/A	7	36 hours
( )	1,000*	64" diameter x 73" length	4	44 hours
( )	1,000*	48" diameter x 128" length	6	58 hours
( )	1,001 - 2,000*	N/A	13	36 hours

\* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments: \_\_\_\_\_

Inspector's Signature: \_\_\_\_\_

Date: 6/18/2007

# Ground Water Monitoring N/A

Date System Installed: \_\_\_\_\_

Distance of well from tank(s) (1) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_ (4) \_\_\_\_\_

Distance of well from piping (1) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_ (4) \_\_\_\_\_

Site assessment was conducted by: \_\_\_\_\_

Location of site assessment documentation: \_\_\_\_\_

**Please answer each question of each well**

If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.

	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.				
Well was opened and presence of water was observed in well at depth of _____ ft.				

**Please answer yes or no for each question**

Wells are used to monitor piping.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Site assessment was performed prior to installation of wells.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Documentation of monthly readings is available.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Specific gravity of product is less than one.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Groundwater is not more than 20 feet from ground surface.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Wells are sealed from the ground surface to top of filter pack.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Groundwater is monitored: ( ) Manually on a monthly basis. ( ) Automatically (continuously or monthly basis [Circle one]).		
Check the following if groundwater is monitored <u>manually</u> : Bailer used is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Check the following if groundwater is monitored <u>automatically</u> : Monitoring box is operational.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Checked for presence of sensor in monitoring well.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: \_\_\_\_\_

Inspector's Signature: \_\_\_\_\_

Date: 6/18/2007

**Interstitial Monitoring** N/A

Manufacturer and name of system: \_\_\_\_\_

Date system installed: \_\_\_\_\_

Materials used for secondary barrier: \_\_\_\_\_

Materials used for internal lining: \_\_\_\_\_

Interstitial space is monitored (Circle one): automatically, continuously, monthly basis.

**Please answer yes or no for each question**

All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
System is designed to detect release from any portion of UST system that routinely contains product.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Documentation of monthly readings is available for last 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Monitoring box, if present, is operational.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>Interstitial space is monitored manually on monthly basis (answer the following question).</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Equipment used to take readings is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>Tank is double-walled</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>Tank is fitted with internal bladder to achieve secondary containment (answer the following question).</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Bladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions).</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier is always above groundwater.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such conditions.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier is constructed from artificially constructed material, with permeability to substance $< 10^6$ cm/sec.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier does not interfere with operation of cathodic protection system.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

Comments: \_\_\_\_\_

Inspector's Signature: 

Date: 6/18/2007

# Automatic Tank Gauging

Manufacturer, name and model number of system:

Veeder Root TLS-300C

Please answer yes or no for each question

Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).

Yes ☒

No ☐

Device can measure height of product to nearest one-eighth of an inch.

Yes ☒

No ☐

Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.

Yes ☒

No ☐

Documentation is available that the ATG was in test mode a minimum of once a month.

Yes ☒

No ☐

Checked for presence of gauge in tanks.

Yes ☒

No ☐

Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).

Yes ☒

No ☐

Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").

Yes ☒

No ☐

Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.

Yes ☒

No ☐

Maintenance records are available upon request.

Yes ☒

No ☐

Monthly testing records are available for the past 12 months.

Yes ☒

No ☐

Daily monitoring records are available for the past 12 months (if applicable).

Yes ☐

No ☐

Comments:

Facility provided ATG and Leak Detection Records for each of the last 13 months.

Inspector's Signature:

*Charles W. Zell*

Date:

6/18/2007



**Statistical Inventory Reconciliation**

N/A

**Please complete all information for each tank**

If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.

**Please answer yes or no for each question**

Records include monthly water monitoring.

Yes ☐No ☐

Tank inventory reconciled before and after fuel delivery.

Yes ☐No ☐

Appropriate calibration chart is used for calculating volume.

Yes ☐No ☐

Dispenser pumps are calibrated to within 6 cubic inches per five gallons.

Yes ☐No ☐

The drop tube in the fill pipe extends to within one foot of tank bottom.

Yes ☐No ☐

Answer one of the following three:

1) Owner can demonstrate consistency in dipsticking techniques.

Yes ☐No ☐

a) The dipstick is long enough to reach the bottom of the tank.

Yes ☐No ☐

b) The end of the gauge stick is flat and not worn down.

Yes ☐No ☐

c) The dipstick is legible &amp; the product level can be determined to the nearest 1/8th inch.

Yes ☐No ☐**OR**

2) Automatic tank gauge is used for readings.

Yes ☐No ☐**OR**

3) Other method is used for readings (explain in comment section below).

Yes ☐No ☐

A third-party certification of the SIR method is available.

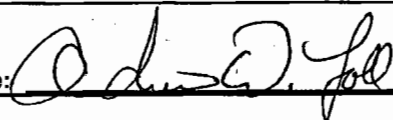
Yes ☐No ☐

Monitoring and testing records are maintained and available for the past 12 months.

Yes ☐No ☐

Comments:

Inspector's Signature:



Date:

6/18/2007

**Spill/Overfill Prevention**

	Tank 1	Tank 2	Tank 3	Tank 4
Are all tank transfers less than 25 gallons?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Spill Prevention</b>				
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Overfill Prevention</b>				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Butterfly valve (in fill pipe)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Automatic alarm monitoring is used	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Other alarm system	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES ☒ NO ☐ (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.)

**Cathodic Protection**

	Tank 1	Tank 2	Tank 3	Tank 4
<b>Sacrificial Anode System</b>				
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
The last two test results are available. (Tests are required every three years.)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Impressed Current</b>				
Rectifier is on 24 hours a day?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
The last two test results are available? (Tests are required every 60 days.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

Comments: Insured through Associated Electric & Gas Insurance Services Limited.

Policy # X2660A1A06.

The last CP testing was completed on 3/26/2007. Both test points showed the potential greater than -0.85 Volts (passing).

Inspector's Signature: Andrew G. Jell

Date: 6/18/2007



## Attachment 2. Photo Log

# Washington, DC

## PHOTO LOG

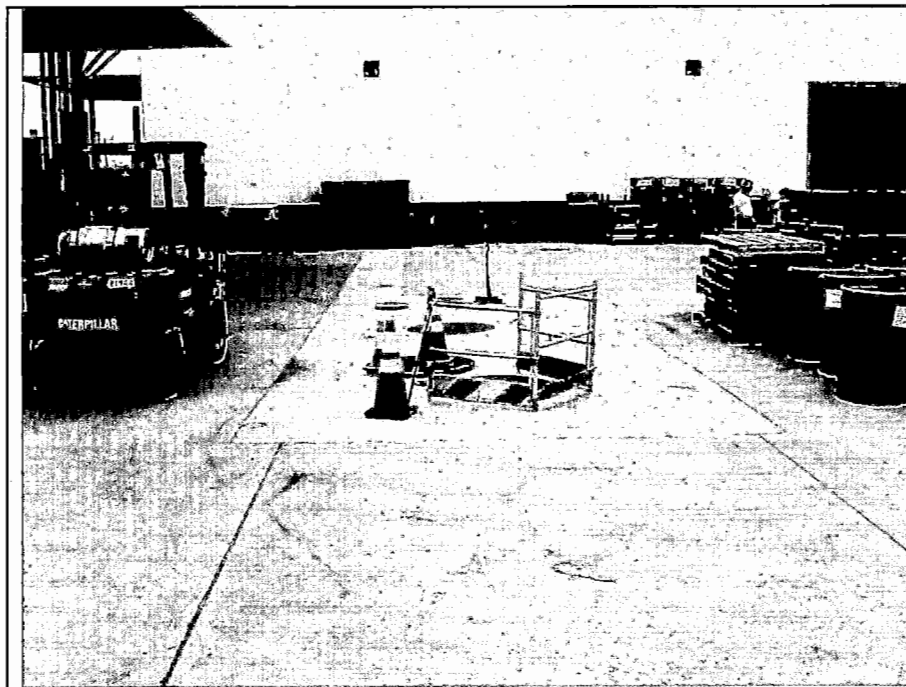
**DATE TAKEN:** 6/15/07

**TAKEN BY:** A. Loll

**PHOTO #:** 1

**COMMENTS:** Site overview:  
Transformer oil UST.

**SITE LOCATION:** View of Transformer Station UST looking north.



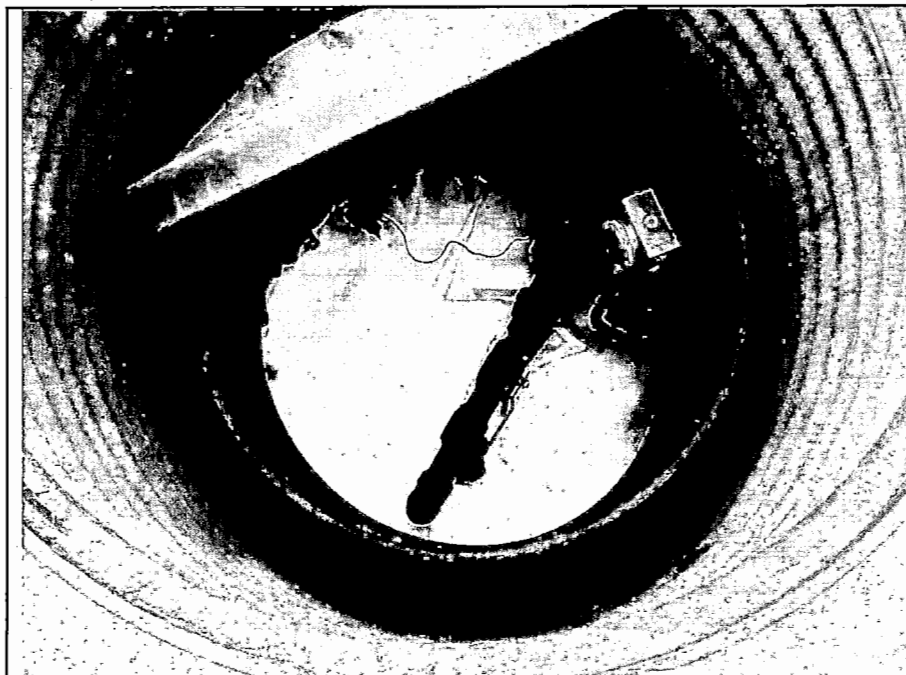
**DATE TAKEN:** 6/15/07

**TAKEN BY:** A. Loll

**PHOTO #:** 2

**COMMENTS:** Transformer oil  
UST manway sump.

**SITE LOCATION:** View of Transformer Station UST.



# Washington, DC PHOTO LOG

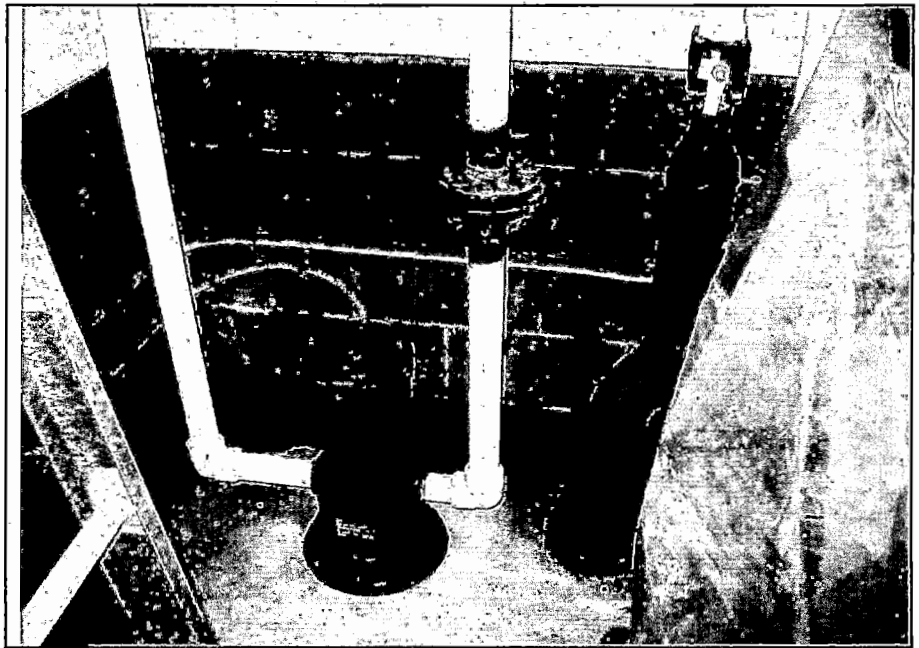
**DATE TAKEN:** 6/15/07

**TAKEN BY:** A. Loll

**SITE LOCATION:** View of Transformer Station UST.

**PHOTO #:** 3

**COMMENTS:** UST piping supplies transformer cooling oil for filling reconditioned transformers.



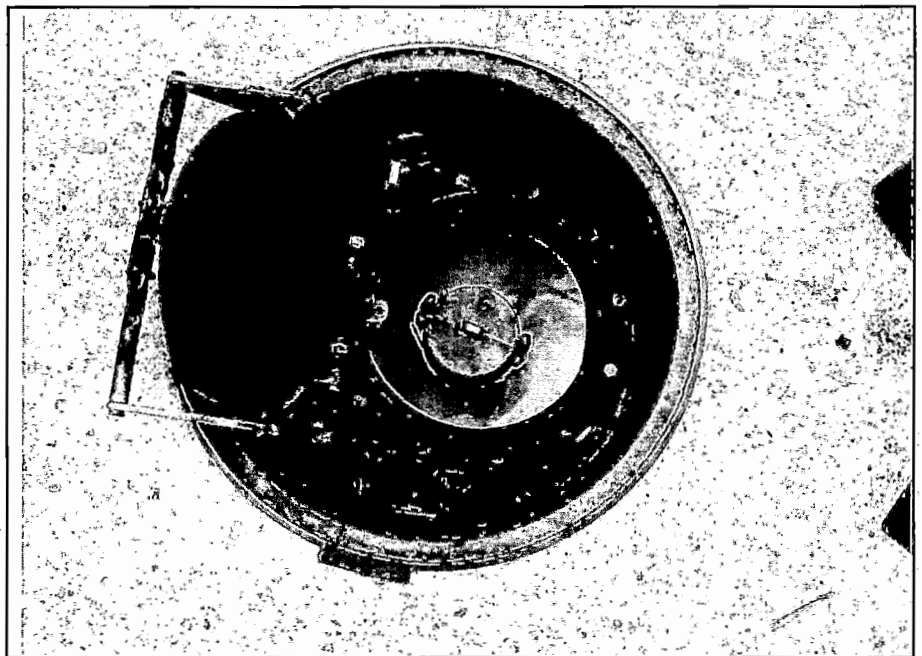
**DATE TAKEN:** 6/15/07

**TAKEN BY:** A. Loll

**SITE LOCATION:** View of Transformer Station UST.

**PHOTO #:** 4

**COMMENTS:** Transformer oil UST fill pipe.



### Attachment 3. ATG Inventory and Leak Detection Testing Reports

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
JUN 10. 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 7625 GALS  
ULLAGE = 7488 GALS  
90% ULLAGE= 5976 GALS  
TC VOLUME = 7605 GALS  
HEIGHT = 63.46 INCHES  
STK HEIGHT= 67.46 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 65.4 DEG F

\* \* \* \* \* END \* \* \* \* \*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
JUN 10. 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

JUN 10. 2006 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
JUN 10. 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 7641.0 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\* \* \* \* \* END \* \* \* \* \*

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
JUL 15, 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 6777 GALS  
ULLAGE = 8336 GALS  
90% ULLAGE= 6824 GALS  
TC VOLUME = 6747 GALS  
HEIGHT = 57.92 INCHES  
STK HEIGHT= 61.92 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 69.1 DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
JUL 15, 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

JUL 15, 2006 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
JUL 15, 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 6846.3 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
AUG 12, 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 6583 GALS  
ULLAGE = 8530 GALS  
90% ULLAGE= 7018 GALS  
TC VOLUME = 6550 GALS  
HEIGHT = 56.64 INCHES  
STK HEIGHT= 57.52 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 70.4 DEG F

\* \* \* \* \* END \* \* \* \* \*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
AUG 12, 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

AUG 12, 2006 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
AUG 12, 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 6645.1 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\* \* \* \* \* END \* \* \* \* \*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
SEP 9, 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 5943 GALS  
ULLAGE = 9170 GALS  
90% ULLAGE= 7658 GALS  
TC VOLUME = 5908 GALS  
HEIGHT = 52.42 INCHES  
STK HEIGHT= 53.30 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 72.4 DEG F

\* \* \* \* \* END \* \* \* \* \*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
SEP 9, 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

SEP 9, 2006 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
SEP 9, 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 6020.8 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\* \* \* \* \* END \* \* \* \* \*



# Delivery

AFTER

STICK  
DROP

88 3/8"

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

OCT 11, 2006 9:57 AM

## SYSTEM STATUS REPORT

ALL FUNCTIONS NORMAL

## INVENTORY REPORT

T 1:TRANS. OILH  
VOLUME = 11219 GALS  
ULLAGE = 3894 GALS  
90% ULLAGE= 2382 GALS  
TC VOLUME = 41164 GALS  
HEIGHT = 87.57 INCHES  
STK HEIGHT= 88.44 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 70.4 DEG F

\*\*\*\*\* END \*\*\*\*\*

BEFORE

STICK  
DROP  
48"

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

OCT 12, 2006 8:34 AM

## SYSTEM STATUS REPORT

T 1:LOW PRODUCT ALARM

T 1:DELIVERY NEEDED

## INVENTORY REPORT

T 1:TRANS. OILH  
VOLUME = 5153 GALS  
ULLAGE = 9960 GALS  
90% ULLAGE= 8448 GALS  
TC VOLUME = 5122 GALS  
HEIGHT = 47.14 INCHES  
STK HEIGHT= 48.01 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 72.4 DEG F

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
OCT 14, 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 11159 GALS  
ULLAGE = 3954 GALS  
90% ULLAGE= 2442 GALS  
TC VOLUME = 11099 GALS  
HEIGHT = 87.14 INCHES  
STK HEIGHT= 88.02 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 71.4 DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
OCT 14, 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

OCT 14, 2006 9:55 PM

## LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
OCT 14, 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 8117.5 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
NOV 11, 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 10549 GALS  
ULLAGE = 4564 GALS  
90% ULLAGE= 3052 GALS  
TC VOLUME = 10500 GALS  
HEIGHT = 82.89 INCHES  
STK HEIGHT= 83.76 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 70.0-DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
NOV 11, 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

NOV 11, 2006 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
NOV 11, 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 10621.0 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
DEC 9. 2006 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 10178 GALS  
ULLAGE = 4935 GALS  
90% ULLAGE= 3423 GALS  
TC VOLUME = 10142 GALS  
HEIGHT = 80.35 INCHES  
STK HEIGHT= 81.22 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 67.3 DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
DEC 9. 2006 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

DEC 9. 2006 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
DEC 9. 2006 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME =10179.2 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

\* \* \* \* \* END \* \* \* \* \*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
JAN 13. 2007 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 9789 GALS  
ULLAGE = 5324 GALS  
90% ULLAGE= 3812 GALS  
TC VOLUME = 9768 GALS  
HEIGHT = 77.72 INCHES  
STK HEIGHT= 78.60 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 64.5 DEG F

\* \* \* \* \* END \* \* \* \* \*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
JAN 13. 2007 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

JAN 13. 2007 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
JAN 13. 2007 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 9784.0 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\* \* \* \* \* END \* \* \* \* \*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
FEB 10. 2007 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 8662 GALS  
ULLAGE = 6451 GALS  
90% ULLAGE= 4939 GALS  
TC VOLUME = 8654 GALS  
HEIGHT = 70.24 INCHES  
STK HEIGHT= 71.12 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 61.9 DEG F

\* \* \* \* \* END \* \* \* \* \*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
FEB 10. 2007 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

FEB 10. 2007 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
FEB 10. 2007 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 8706.5 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\* \* \* \* \* END \* \* \* \* \*

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
MAR 10. 2007 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 8106 GALS  
ULLAGE = 7007 GALS  
90% ULLAGE= 5495 GALS  
TC VOLUME = 8108 GALS  
HEIGHT = 66.60 INCHES  
STK HEIGHT= 67.48 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 59.2 DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
MAR 10. 2007 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

MAR 10. 2007 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
MAR 10. 2007 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 8177.7 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
APR 14. 2007 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 7433 GALS  
ULLAGE = 7680 GALS  
90% ULLAGE= 6168 GALS  
TC VOLUME = 7431 GALS  
HEIGHT = 62.21 INCHES  
STK HEIGHT= 63.09 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 60.6 DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
APR 14. 2007 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

APR 14. 2007 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
APR 14. 2007 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 7497.2 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

\* \* \* \* \* END \* \* \* \* \*

START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
MAY 12. 2007 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 6757 GALS  
ULLAGE = 8356 GALS  
90% ULLAGE= 6844 GALS  
TC VOLUME = 6750 GALS  
HEIGHT = 57.79 INCHES  
STK HEIGHT= 58.66 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 62.2 DEG F

\* \* \* \* \* END \* \* \* \* \*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
MAY 12. 2007 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

MAY 12. 2007 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
MAY 12. 2007 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 6891.1 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\* \* \* \* \* END \* \* \* \* \*



START IN-TANK LEAK TEST  
TEST BY PROGRAMMED TIME  
JUN 9. 2007 7:55 PM

TEST LENGTH 4 HOURS

T 1:TRANS. OILH  
VOLUME = 6502 GALS  
ULLAGE = 9611 GALS  
90% ULLAGE= 7099 GALS  
TC VOLUME = 6487 GALS  
HEIGHT = 56.11 INCHES  
STK HEIGHT= 56.98 INCHES  
WATER VOL = 0 GALS  
WATER = 0.00 INCHES  
TEMP = 64.6 DEG F

\*\*\*\*\* END \*\*\*\*\*

STOP IN-TANK LEAK TEST  
T 1:TRANS. OILH  
JUN 9. 2007 9:55 PM

PEPCO  
BENNING RD  
WASHINGTON DC  
202-388-2357

JUN 9. 2007 9:55 PM

LEAK TEST REPORT

T 1:TRANS. OILH  
PROBE SERIAL NUM 671667

MOST RECENT AVERAGED  
TEST STARTING TIME:  
JUN 9. 2007 7:55 PM

AVG LENGTH = 2.0 HRS  
AVG VOLUME = 6518.2 GAL

AVG LEAK TEST RESULTS  
0.20 GAL/HR TEST PASS

\*\*\*\*\* END \*\*\*\*\*

## Attachment 4. Veeder-Root Monitoring Certification Summary

# **K & G PETROLEUM SERVICES, INC.**

**200 Sandhill Court St. Leonard, MD. 20685-2598**

**Phone 410-495-8100 ~ Fax 410-495-7888**

July 22, 2006

George Hume  
PEPCO Benning Transformer Shop  
3400 Benning Rd. N.E.  
Bldg. 56  
Washington, D.C. 20019

## **RE: INSPECTION OF THE TRANSFORMER SHOP VEEDER ROOT TLS 300C TANK MONITORING SYSTEM**

Dear Dan:

This is to certify that on July 19, 2006 the TLS 300 C monitoring system was tested for accuracy of operation.

The Veeder Root TLS 300 C control panel is programmed to activate an audible alarm if product or water is detected in the interstice of the tank by the annular space sensor.

The annular space sensor, located in the interstice of the tank, was removed and placed in water. The alarm was activated at the TLS 300 C control panel indicating that the sensor is in good operating condition and an alarm report printed.

The system set up parameters were printed and verified to be correct.

The inventory report was printed and compared to the actual stick reading that was taken at the UST. The leak test report and liquid status was also printed.

All functions of the system checked out o.k. except the probe cable which needs to be replaced. The reading was showing 1-1/2" more product than the actual level.

Sincerely,



Keith Griffin  
K & G Petroleum Services, Inc.  
Advanced Technician

## Attachment 5. Line Tightness Testing Results

STATION NUMBER

For Use With

petro test

DATE

11/11/05

1 LOCATION

Pepco 2600 Benning Rd. N.E.

2 OWNER

Name

Address

Representative

Position

Telephone No.

3 OPERATOR

Name

Dealer, Mgr. or Other

Address (if different from Location)

Telephone No.

4 REASON FOR TEST

regulatory

5 TEST REQUESTED BY

Mr. Hume

Name

Position

Telephone No.

6 SPECIAL INSTRUCTIONS

transformer oil

7 CONTRACTOR OR COMPANY MAKING TEST

PETRO SUPPLY, INC.

Brian Arye

8 IS A TANK TEST TO BE MADE WITH THIS LINE TEST?

☐ YES☒ NO

9 MAKE AND TYPE OF PUMP OR DISPENSERS (SUCTION OR SUBMERSIBLE)

section system

10 WEATHER

clear 70°

TEMPERATURE IN TANKS

°F

°C

COVER OVER LINES

Concrete

APPROXIMATE BURIAL DEPTH

50"

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC.	14 PRESSURE psi OR kPa		15 VOLUME READING		16 REMARKS SIZE, LENGTH & TYPE OF LINE, & FLEX CONNECTORS CONCLUSIONS, REPAIRS AND COMMENTS
			BEFORE	AFTER	BEFORE	AFTER	
Oil	8:30	START TEST		10			000 GALLONS PER HOUR tight
	8:45	Test#1	10	10	.067	.067	
	9:00	Test#2	10	10	.067	.067	
	9:15	Test#3	10	10	.067	.067	
	9:30	Test#4	10	10	.067	.067	
		Bleedback Pressure		010			
PLUS		START TEST					GALLONS PER HOUR
		Test#1					
		Test#2					
		Test#3					
		Test#4					
		Bleedback Pressure					
SUPER		START TEST					GALLONS PER HOUR
		Test#1					
		Test#2					
		Test#3					
		Test#4					
		Bleedback Pressure					
DIESEL		START TEST					GALLONS PER HOUR
		Test#1					
		Test#2					
		Test#3					
		Test#4					
		Bleedback Pressure					

TEST RESULTS

Tests were made on the above line systems in accordance with test procedures prescribed for as detailed on attached test charts with the results as follows:

Line Identification	Meets Criteria	Net Volume Change Per Hour	Date Tested
oil	tight	000	11/11/05

17 CONTRACTOR CERTIFICATION.

 Technician  
 Brian Arye  
 Signature

15,170 gal transformer oil 49T.

DATA CHART  
For Use With  
Petro-Trip

JAN 14 2005

DATE 12/17/02

STATION NUMBER

1 LOCATION Pepco 3400 Benning Rd. N.E. D.C.

2 OWNER

3 OPERATOR

4 REASON FOR TEST

5 TEST REQUESTED BY

6 SPECIAL INSTRUCTIONS

7 CONTRACTOR OR COMPANY MAKING TEST

8 IS A TANK TEST TO BE  
MADE WITH THIS LINE TEST?☐ YES  
☒ NO9 NAME AND TYPE OF  
PUMP OR DISPENSERS (SUCTION OR SUBMERSIBLE)

10 WEATHER

cloudy 40°

TEMPERATURE IN TANKS

°F °C

COVER

Concrete

APPROXIMATE

BURIAL DEPTH

36"

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURE AMBIENT TEMPERATURE, WEATHER ETC	14 PRESSURE PSI OR KPS		15 VOLUME READING		16 REMARKS SIZE, LENGTH & TYPE OF LINE, & FLEX CONNECTORS CONCLUSIONS, REPAIRS AND COMMENTS
			BEFORE	AFTER	BEFORE	AFTER	
TRANS.	10:45	START TEST		40			
OIL	11:00	TEST #1	40	40	051	051	000
	11:15	TEST #2	41	40	051	052	001
	11:30	TEST #3	40	40	052	052	000
	11:45	TEST #4	40	40	052	052	000
		BLEEDBACK PRESSURE		038			
PLUS		START TEST					
		TEST #1					
		TEST #2					
		TEST #3					
		TEST #4					
		BLEEDBACK PRESSURE					
SUPER		START TEST					
		TEST #1					
		TEST #2					
		TEST #3					
		TEST #4					
		BLEEDBACK PRESSURE					
DIESEL		START TEST					
		TEST #1					
		TEST #2					
		TEST #3					
		TEST #4					
		BLEEDBACK PRESSURE					

7.001  
GALLONS PER HOUR  
tight

GALLONS PER HOUR

GALLONS PER HOUR

GALLONS PER HOUR

TEST RESULTS

Tests were made on the above line systems in accordance with test procedures prescribed for  
as detailed on attached test chart with the results as follows:

Line Identification	Make & Model	Net Volume Change Per Hour	Date Tested
Trans. oil	tight	7.001	12/17/02

17 CONTRACTOR CERTIFICATION

E. H. Burke, Jr.

Contract made

## Attachment 6. Cathodic Protection Testing Results

**pepco**

# T & D TEST WORK ASSIGNMENT

DATE: 3/26/2007

WREQUEST NUM: 3187310

FEEDER NUMBER:

REPORTEDBY:

X142ROA

WONUM: 71776

PHASE:

REPORTED BY DATE:

03/26/2007

LOCATION: DISTRIBUTION TEST

GRID NUMBER:

WORKTYPE:

SUPERVISOR DOHERTYTB

GL ACCOUNT: 142195846.12

STATUS:

INPRG

LEADCRAFT: GILCHRISTHL

JOB PLAN: TDT-CRST

STATUS DATE:

03/26/2007

CUSTOMER NAME: TRANSFORMER SHOP

FAILURECODE

CRST

STREET ADDRESS: 3400 BENNING RD

PROBLEM:

CITY, STATE, ZIP: NE

CAUSE:

JURISDICTION:

ADDITIONAL PROBLEM:

CUSTOMER PHONE: DC

ADC MAP CODE:

CIS TEXT:

WOPRIORITY

3

LABOR HOURS/JOB:

0

WORK ORDER DESCRIPTION:

CORROSION TEST/Perform survey on Transformer Shop Oil Tanks - See attached sheets for details

LONG DESCRIPTION: ATTN !!! \*\*\* See H. Eversole before attending ! \*\*\*

INSPECTOR REPORT:

*test station*

*#2 296-1.1*

*test station*

*#1 1.23*

*copy to Hume*

TARGET START DATE:

TARGET COMPLETION DATE:

ASSIGNED: *3/26/07*

DATE ATTENDED: *3/27/07*

DATE TESTER COMPLETED: *3/27/07*

DATE JOB COMPLETED: *1/1*

MH/JOB: \_\_\_\_\_

COMPLETED BY: *[Signature]*

SUPERVISOR: \_\_\_\_\_





## T & D TEST WORK ASSIGNMENT

DATE 6/2004

WREQUEST NUM: 103116

FEEDER NUMBER

REPORTED BY

AIXENR

WONUM: 21124

PHASE

REPORTED BY DATE

06/01/2004

LOCATION DISTRIBUTION TYPE

GRID NUMBER

WORK TYPE

SUPERVISOR DOHRTYTD

GL ACCOUNT 1031124632

STATUS

INFO

LEADCRAFT 44V/300/33H

JOB PLAN TDI CRT

STATUS DATE

06/01/2004

CUSTOMER NAME: TRANSFORMER SHOP

STREET ADDRESS: 3400 BENNING RD

CITY, STATE, ZIP: NE

JURISDICTION: DC

CUSTOMER PHONE:

CIS TEXT:

WORK ORDER DESCRIPTION:

TRANSFORMER CORROSION TEST/RETEST OIL TANK

FAILURE CODE

CRST

PROBLEM:

CAUSE:

ADDITIONAL PROBLEM:

ADC MAP CODE:

WOPRIORITY

3

LABOR HOURS/JOB:

0

LONG DESCRIPTION:

INSPECTOR REPORT:

Test station #1 1.23 Vg  
Test station #2 1.31 Vg

Copy to Mr. Hume.

JUN 03 2004

TARGET START DATE:

ASSIGNED: 6/3/4

DATE ATTENDED: 6/3/4

MH/JOB:

TARGET COMPLETION DATE:

DATE TESTER COMPLETED: 6/3/4

COMPLETED BY:

DATE JOB COMPLETED: 1/1

SUPERVISOR:

## CORROSION TEST

**TOMAC ELECTRIC POWER COMPANY**  
**TEST**

## T&D CONSTRUCTION

**T&D**

[illegible]

TO FARIBA 4-17-01

## Attachment 7. Proof of Financial Assurance

**ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LIMITED**Endorsement No. 35A Effective Date of Endorsement October 31, 2006Attached to and forming part of POLICY No. X2660A1A06NAMED INSURED Pepco Holdings, Inc.

It is understood and agreed that this POLICY is hereby amended as indicated. All other terms and conditions of this POLICY remain unchanged.

**UNDERGROUND STORAGE TANK FINANCIAL  
RESPONSIBILITY ENDORSEMENT****DECLARATIONS**

- Item UST1: A. Name of each covered location:  
(See Section 3)  
B. Address of each covered location:  
(See Section 3)
- Item UST2: Policy Number: X2660A1A06
- Item UST3: Period of coverage: October 31, 2006 to October 31, 2007
- Item UST4: A. Name of Insurer: Associated Electric & Gas Insurance Services Limited  
B. Address of Insurer: One Church Street, P.O. Box HM2455, Hamilton, HMJX BERMUDA
- Item UST5: A. Name of Insured: Potomac Electric Power Company  
B. Address of Insured:  
701 Ninth Street, N.W.  
Washington, DC 20068

**INSURING AGREEMENT**

1. This Endorsement certifies that the POLICY to which the Endorsement is attached provides liability insurance covering the underground storage tank(s) listed in Section 3 to this Endorsement for taking corrective action and/or compensating third parties for BODILY INJURY and PROPERTY DAMAGE caused by accidental release; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the POLICY; arising from operating the underground storage tanks identified Section 3.

The limits of liability of the Insurer's liability are:

\$1,000,000 each OCCURRENCE; and

\$3,000,000 annual aggregate exclusive of legal defense costs, which are subject to a separate limit under the POLICY.

# **UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT**

This coverage is provided under POLICY No. X2660A1A06  
The effective date of said POLICY is October 31, 2006

2. The insurance afforded with respect to such OCCURRENCES is subject to all of the terms and conditions of the POLICY; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):
  - a. Bankruptcy or insolvency of the INSURED shall not relieve the Insurer of its obligations under the POLICY to which this Endorsement is attached.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the POLICY to the provider of corrective action or a damaged third-party, with a right of reimbursement by the INSURED for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102.
  - c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the POLICY and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer except for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the INSURED. Cancellation for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the INSURED.
  - e. The insurance covers CLAIMS otherwise covered by the POLICY that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the POLICY except where the new or renewed POLICY has the same retroactive date or a retroactive date earlier than that of the prior POLICY, and which arise out of any covered OCCURRENCE that commenced after the POLICY retroactive date, if applicable, and prior to such POLICY renewal or termination date. CLAIMS reported during such extended reporting period are subject to the terms, conditions, limits, including Limits of Liability, and exclusions of the POLICY.

3.

<u>Name of Covered Location</u>	<u>Address</u>	<u>Number of Tanks</u>
Buzzard Point Generating Station	1st and V Street, SW Washington, D.C. 20024	9
Benning Generating Station	3400 Benning Road, NE Washington, D.C. 20019	4
Howatt Building	1620 2nd Street, SW Washington, D.C. 20006	1
Champlain Substation	2119 Champlain Street, NW Washington, D.C. 20008	1
Van Ness Substation	4000 Van Ness Street Washington, D.C. 20016	1
Irving Substation	1032 Irving Street, NE Washington, D.C. 20018	1

# UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

<u>Name of Covered Location</u>	<u>Address</u>	<u>Number of Tanks</u>
Alabama Avenue Substation	3302 15th Street, SE Washington, D.C. 20020	1
 <u>MARYLAND</u>		
Dickerson Generating Station	21200 Martinsburg Road Dickerson, MD 20753	1
Chalk Point Generating	Eagle Harbor Road Aquasco, MD 20608	11
Defense Mapping Agency	6500 Brooks Lane Washington, D.C. and Sangamore Lane Glen Echo, MD	1
Morgantown Generating Station	P.O. Box Newburg, MD 29795	5
Forestville Production Service Center	8711 Westphalia Road Upper Marlboro, MD 20772	7
Bethesda Substation	4935 Del Ray Avenue Bethesda, MD 20814	1
Brighton Substation	1300 Brighton Dam Road Brighton, MD 20833	1
Possom Point Substation	19000 Brighton Dam Road Dumfries, MD 22026	1
Palmers Corner Substation	3001 Tucker Road Oxon Hill, MD 20744	1
Quince Orchard Substation	1701 Darnestown Road Germantown, MD 20874	1
Bells Mill Substation	10611 Westlake Drive Rockville, MD 20817	4
Oak Grove Substation	3132 Brown Station Road Upper Marlboro, MD 20772	1

# **UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT**

<u>Name of Covered Location</u>	<u>Address</u>	<u>Number of Tanks</u>
Norbeck Substation	16610 Emory Lane Rockville, MD 20853	1
Bowie Substation	Jericho Park & Lemmons St. Rds. Jericho Park, MD 20715	1
Burches Hills Substation	8101 Surrats Road Clinton, MD 20735	2
Rockville Service Center	1600 Gaither Road Rockville, MD 20850	5
<b><u>VIRGINIA</u></b>		
Potomac River Generating Station	1400 North Royal Street Alexander, VA 22314	4

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97 (b) (1) and that the Insurer is eligible to provide insurance as an excess or surplus lines insurer in one or more States.

AEGIS Insurance Services, Inc.  
Authorized Representative of:  
Associated Electric & Gas Insurance Services Limited  
1 Meadowlands Plaza  
East Rutherford, New Jersey 07073

Signature of Authorized Representative